From: (b) (6)

Sent: Wednesday, August 31, 2016 1:17 PM

To: HarborComments

Subject: EPA Harbor Cleanup Letter

Attachments: removed.txt; EPA Harbor Cleanup.pdf; Op-ed - Portland Harbor

cleanup - John Mohlis.docx

John Mohlis
Executive Secretary
Oregon State Building and Construction Trades Council
3535 SE 86th Avenue
Portland, OR 97266
O- 503.788.7153

(b) (6)

Portland workers need a smart, cost-effective cleanup plan for the Willamette River

By John Mohlis

For over a century, the Willamette River has shaped the City of Portland. It served as a major transportation route in the 19th century, serving the city's growing population and allowing commerce and industry to flourish as it still does to this day. It's also home to fish and wildlife and recreational opportunities for Portlanders and visitors alike.

Now, the river needs our help.

In 2000, the U.S. Environmental Protection Agency declared a 10-mile stretch of the Lower Willamette River, known as the Portland Harbor, a Superfund site. The Portland Harbor runs from around the Fremont Bridge to nearly the Columbia River and is home to historic contamination dating back more than a century.

The EPA has been planning for a cleanup for 16 years. It is past time for the work to begin, and we're closer than ever to getting to that point.

On June 8, the EPA released its proposed plan to guide the 2,200-acre cleanup. The EPA is seeking the public's input on the \$746 million plan and hopes to adopt it before President Obama leaves office in January. The main risk the cleanup seeks to address is eating resident fish like bass and carp; thankfully, our river is still safe to swim, recreate and eat migratory fish like salmon.

We can all agree that any cleanup plan must protect public health and wildlife habitat. The cleanup should be sustainable for the river and our community. We should also be focused on the cleanup's potential to impact our long-term economic growth or our ability to address other important community priorities like affordability and the need for middle-income jobs.

There are also questions about whether the EPA has underestimated the cost of the plan and the timeframe in which it could be completed. This is important because we must recognize that the cost of the cleanup will be borne by all of us.

Why? Because by law, the cost will be allocated among businesses (big and small), land owners, local utilities and government agencies, including the city of Portland, all of whom are on the "Potentially Responsible Parties List." This means taxpayers and ratepayers are also on the hook for the cost of cleanup.

We need to be sure the EPA's ultimate cleanup plan protects public health and maintains jobs and a strong economy. Ensuring flexibility to carefully manage costs and benefits will allow us to do both. It would be unfortunate if, instead, the cleanup hurt the many small businesses that rely on the harbor or jeopardized the middle-income jobs that thrive there.

The Portland Harbor isn't visible on everyone's morning commute. But it is one of Oregon's most important sources of family-wage jobs. Companies in the harbor directly employ 30,000 people earning an average annual wage of \$51,000, according to a study commissioned by the Port of Portland.

The cleanup has to be healthy for the river and it also has to be healthy for the workers and their families, too. To learn more and to share your comments with the EPA, visit rivercleanupnow.com.

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John Mohlis is the executive secretary of the Oregon State Building & Construction Trades Council.



Oregon State Building and Construction Trades Council

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August 31, 2016

VIA EMAIL

U.S. Environmental Protection Agency Harbor Comments 805 S.W. Broadway, Suite 500 Portland, OR 97205

Dear EPA Officials,

The Oregon Building and Construction Trades Council is an umbrella organization for approximately 25,000 union construction workers in Oregon. We recognize the Proposed Plan marks a significant milestone in a very long process for the Portland Harbor Superfund site. We support a river cleanup that protects the health of Portlanders and the environment and is done cost-effectively.

The Willamette River is many things to Portlanders -- a place for recreation, a home for wildlife and also an industrial harbor, Oregon's largest seaport. Portland's working harbor is important to us. Nearly 30,000 people are employed in Portland's working harbor, jobs that must be preserved during the cleanup. These blue collar jobs pay above the statewide average wage and are crucial to our community.

We are concerned about the ultimate cost of cleanup and ensuring that the true costs and benefits are transparent to Portlanders. We believe some of EPA's cost assumptions are overly-optimistic and resulted in a final price tag that is not accurate. Our livelihoods depend on providing accurate cost estimates. We urge EPA to get their numbers right so Portlanders are educated about the costs of cleanup. The cleanup of the Portland Harbor arrives at a time that our city is growing and we face many critical affordability issues.

We believe the cleanup of the Willamette River offers opportunities for the future of our region. We are hopeful that the final cleanup decision provides certainty for future investments in Portland Harbor. When harbor businesses choose to expand, this provides work opportunities for our members and contractors. We also believe the final decision needs to provide certainty of cost for Portland residents who will ultimately be paying some of these cleanup costs.

The Portland Harbor Superfund site is very large and we understand that the risks are not the same across the site. We encourage EPA to prioritize cleaning up the most contaminated locations first and giving parties' flexibility to move forward quickly. The opportunities presented by cleanup are only realized if this moves forward soon.

Enclosed please find a copy of an Op-Ed piece that was recently published in the Oregonian that reflects our Council's position on this important matter.

Thank you for the opportunity to provide these comments.

John Mohlis

Executive Secretary